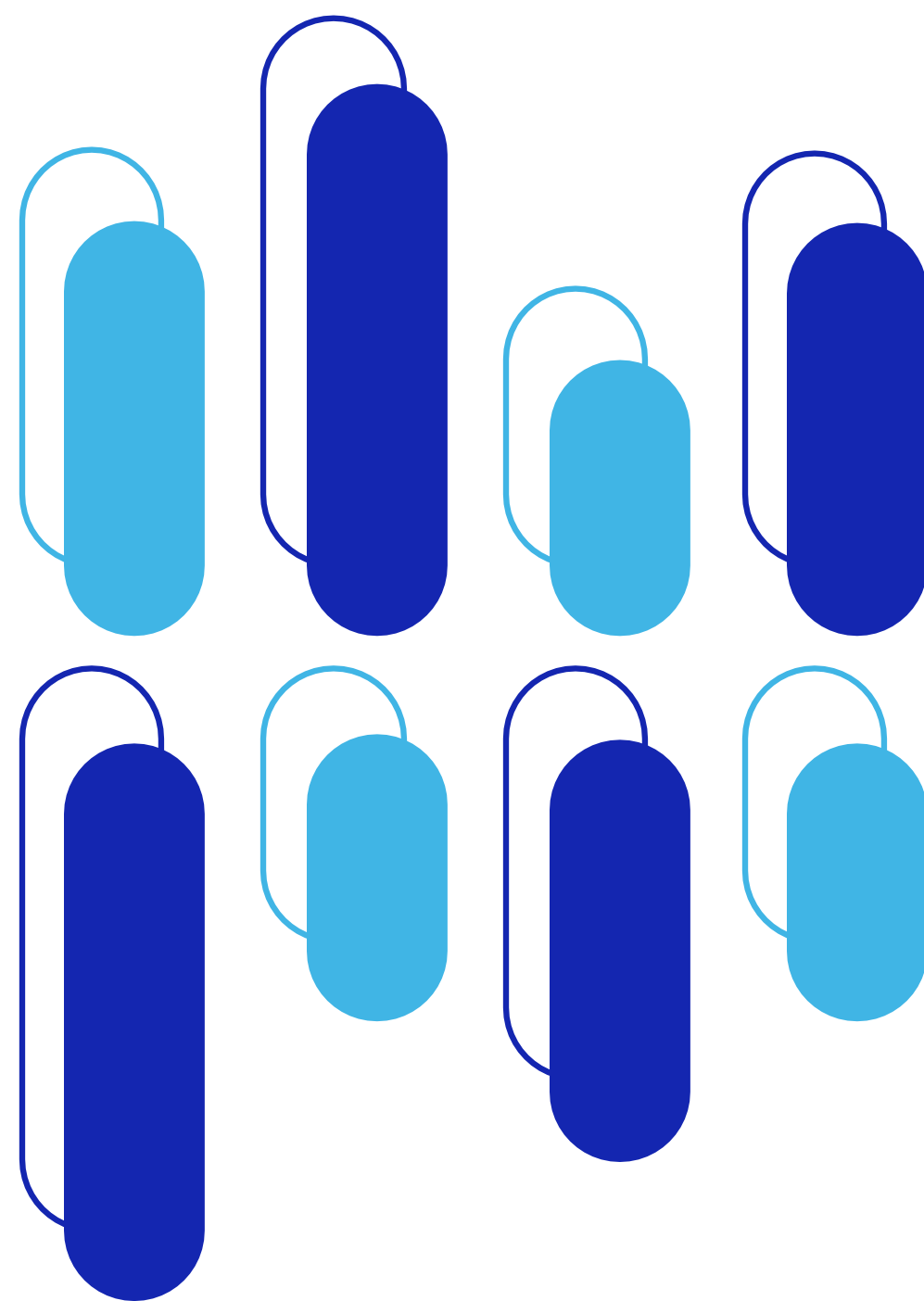




Code of Ethics

of Grupa Pracuj



Dear All,

we present to you the Code of Ethics of Grupa Pracuj. This is a unique document that comprehensively describes the core values and ethical standards that are the pillars of our business operations. It is addressed to all companies within Grupa Pracuj as well as anyone who works with us or acts on our behalf. It should guide us and serve as a foundation of our daily conduct. The examples and tips contained herein illustrate how to follow Grupa Pracuj's ethical principles in practice.

The Code is an expression of our professional approach to work and solid performance of our duties, and it also emphasises our openness and willingness to cooperate. Through respect for one another and good relationships across diverse teams, we create value for Grupa Pracuj and build its reputation. An ethical attitude is the foundation of our operations and the development of all our brands.

Our effectiveness comes from the trust that customers, users and employees place in us every day. Trust is largely the result of respect for the principles contained in the Code of Ethics. It is credibility and integrity that guarantee our stable and sustainable development.

We strongly encourage you to carefully read the Code and reflect on its contents. Adherence to the rules described herein is our joint responsibility. We also encourage you to engage in active discussion – the Compliance Team is ready to address any concerns and answer your questions.

Management Board of Grupa Pracuj S.A.

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Code of Ethics

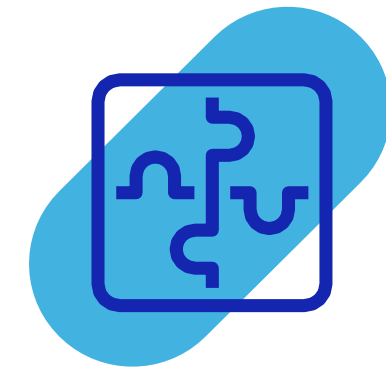
of Grupa Pracuj

Grupa Pracuj – jointly or individually shall mean Grupa Pracuj S.A. and the companies comprising the group according to the **organisational chart**.

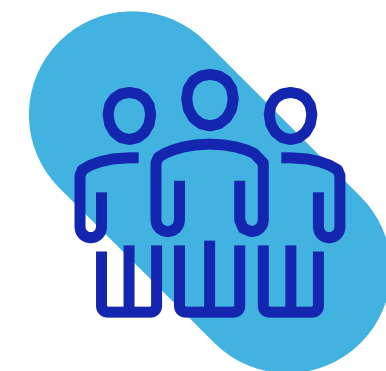
Whenever we use in the Code:

- **we** – we mean Grupa Pracuj,
- **you** (when addressing you)

– we mean each of our employees and associates, i.e. people working with us under civil law contracts.



The Code of Ethics is a set of our principles and standards of behaviour. It is based on the values that guide us every day. It contains our commitments and guidelines as to what conduct we expect and what behaviour is unacceptable to us.



All employees and associates of Grupa Pracuj are required to abide by the Code. Violation of its provisions will be treated as a serious breach of terms of the agreement concluded with Grupa Pracuj.

Code of ethics

of Grupa Pracuj

WE HAVE THE POWER TO MAKE THINGS HAPPEN – WE ACT ETHICALLY



- We consistently develop a system of ethics based on legal regulations and voluntary commitments described in the Code of Ethics.
- We take into account the recommendations under the Best Practices of WSE Listed Companies.
- We identify non-compliance risks as part of the risk management system to take remedial action.
- We raise awareness among employees and associates by organising training sessions and providing information about Grupa Pracuj's values as part of onboarding.

WHAT WE EXPECT FROM YOU

- Comply with the Code of Ethics and all the rules contained herein.
- Care for the good name of Grupa Pracuj.
- Treat legal requirements as a minimum standard.
- Follow the internal procedures and policies that we have posted on the Intranet.
- Participate in mandatory training organised at Grupa Pracuj.

REMEMBER

- The Code of Ethics applies to the entire Grupa Pracuj community, regardless of function or position.
- Failure to comply with the principles described in the Code of Ethics may be considered a breach of contractual obligations – with all consequences, including termination of the contract in case of serious irregularities.

Code of ethics

of Grupa Pracuj

Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT



COMPLIANCE SYSTEM AT GRUPA PRACUJ

In order to adequately meet the legal requirements and market expectations placed on Grupa Pracuj, we have appointed a **Compliance Officer**, who, together with their team, supervises the compliance of Grupa Pracuj's activities with applicable laws and internal regulations.

The Compliance Officer monitors compliance risks, creates and updates procedures, and manages whistleblowing systems.

The Compliance Officer also provides support for all employees and associates if questions arise in daily work about the ethicality of actions taken.

IS MY BEHAVIOUR ETHICAL?

- 1) Were all relevant issues considered and properly evaluated in my decision? (substantive test)
- 2) Do I feel that my decision complies with applicable laws and internal regulations? (legality test)
- 3) Will I defend my decision when it comes out? (superior's test)
- 4) Would the same decision be made across Grupa Pracuj, in all similar cases? (universality test)
- 5) Would my decision be received positively by third parties or described in a favourable light in the media? (publicity test)
- 6) Would I have made the same decision if the issue had affected me personally? (reference test)
- 7) Would my decision meet with the approval of my loved ones? (second opinion)

If you answered Yes to all of the above questions, then your conduct is most likely in compliance with our Code of Ethics.

Our Values

GP Way is a culture developed over years of experience and is the pillar of Grupa Pracuj's operations. Based on operational efficiency, it includes:

- *high touch* sales and customer service skills,
- an organisational culture focused on employee engagement and achieving results,
- discovery, development and monetisation of products tailored to different customer groups and needs,
- an entrepreneurial mindset.



The organisational culture of Grupa Pracuj is based on commitment and shared values. When making decisions, we act ethically, honestly and responsibly. We comply with the requirements of the law and are guided by the highest standards of ethical conduct.



Our employees and associates should act transparently and in accordance with the law. We believe that a mutual commitment to ethical behaviour is a key element of successful operations.

Our Values



OUR VALUES

- Focus on the customer.
- Courage to take action and learn from mistakes.
- Accountability for commitments, actions and results.
- Agility in learning and adapting to a changing environment.
- Respect for diversity.
- Positive vibe at work.

OUR COMMITMENTS

- We operate in accordance with the law and our internal procedures.
- We respect human rights, fundamental freedoms and democratic principles and standards.
- We care about the safety, well-being and dignity of our employees and associates.
- We build an atmosphere of acceptance and respect for diversity.
- We create an engaging work environment, providing employees and associates with opportunities for growth.
- We provide transparent terms of cooperation and act honestly towards customers.
- We take care of the quality of our services to ensure safety and legal compliance.
- We verify suppliers and select only those who meet the highest standards.
- We are guided by the principles of fair competition and have introduced an absolute ban on corruption.
- We adhere to the principle of confidentiality and prohibit dissemination of protected information.
- We follow detailed information security and data protection guidelines.
- We respect the environment and build environmental awareness in the organisation.

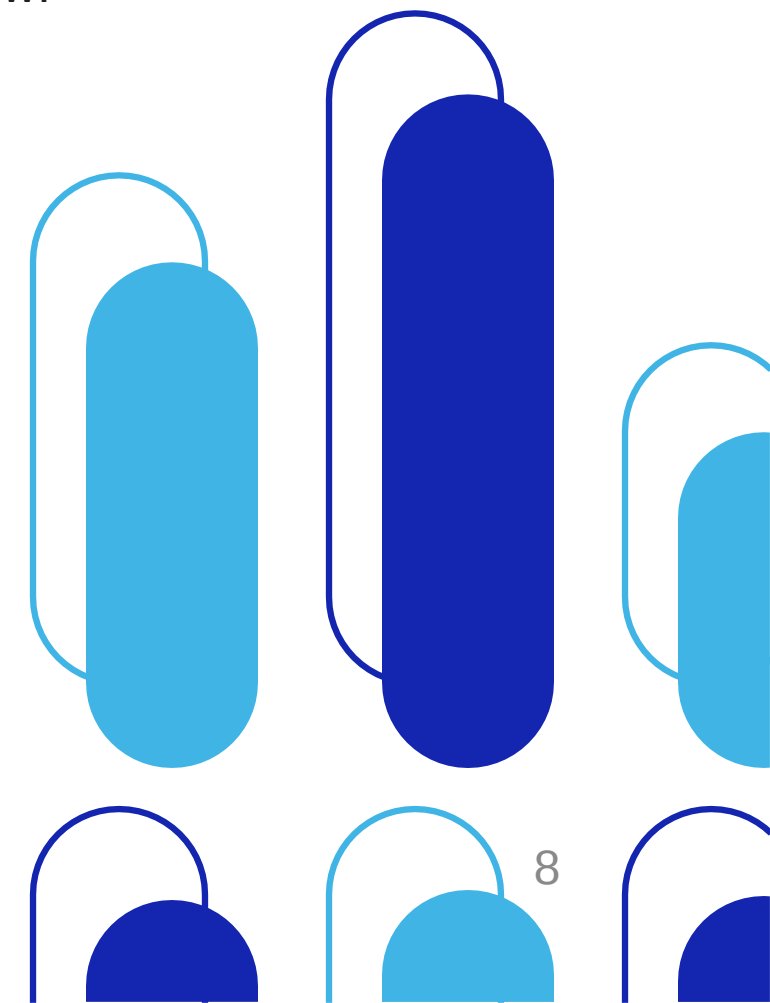
Our Values

WHAT WE EXPECT FROM YOU

- Inform us of any irregularities you notice or suspect.
- Treat people with respect, regardless of race, age, gender, nationality, orientation, religion, etc.
- Build open communication and care for the good name of Grupa Pracuj.
- Plan and develop your activities in such a way that they do not create a conflict of interest between Grupa Pracuj and our contractors.
- In your relationship with customers, be guided by the high standards set forth in the Code of Ethics.
- Keep only the interests of Grupa Pracuj in mind when choosing a supplier.
- Do not accept or offer personal benefits that may influence decisions.
- Properly secure all protected information and personal data.
- Save natural resources for the sake of our common future.
- Follow the values of Grupa Pracuj, detailed information on which can be found below.

FOCUS ON THE CUSTOMER

- Listen to customers' needs.
- Act proactively and quickly.
- Build open communication based on mutual respect.
- Develop solutions/products that meet real customer needs – keep it simple.



Our Values



COURAGE TO TAKE ACTION AND LEARN FROM MISTAKES

- Get out of your comfort zone.
- Challenge the status quo.
- Take calculated risks.
- Learn from failures and mistakes and talk about them openly.
- Share your opinions.

ACCOUNTABILITY FOR COMMITMENTS, ACTIONS AND RESULTS

- Keep your promises.
- Seek support if you face obstacles.
- Be realistic.
- Appreciate achievements and accept brutal facts and setbacks.
- Don't give up.

Our Values



AGILITY IN LEARNING AND ADAPTING TO A CHANGING ENVIRONMENT

- Set goals, monitor their achievement, and adjust your actions.
- Accept change as part of life.
- Remember that done is better than perfect.
- Never stop learning.

RESPECT FOR DIVERSITY

- Treat people with respect, regardless of race, age, gender, nationality, sexual orientation, religion, etc.
- Support people facing physical and mental ailments, in an inclusive environment.
- Be curious and open to different points of view.
- Control your emotions and pay attention to the emotions of others.

POSITIVE VIBE AT WORK

- Maintain a positive attitude.
- Give constructive criticism and honest feedback in a positive way.
- Celebrate successes and appreciate colleagues.
- Work hard, play hard :).

Reporting irregularities

Irregularities are all events that affect us and constitute a violation of:

- legal provisions,
- this Code of Ethics,
- other applicable regulations in place at Grupa Pracuj.

Do you have questions, concerns, need a consultation?

Contact the Compliance Officer by writing to compliance@pracuj.pl

CONTACT



We attach great importance to preventing irregularities and reducing the effects of those that occur. We have developed a pathway to respond properly and quickly to all reports.



We have launched a platform available at gp.zalezymi.pl where you can report irregularities. You can do it anonymously, but remember to provide the information necessary to consider the case. Depending on the subject of your report, we will take further action in accordance with our Whistleblowing procedure (link).

Reporting irregularities

OUR COMMITMENTS

- We have appointed a Compliance Officer to ensure that reports are properly considered.
- We provide secure reporting channels and confidentiality to whistleblowers.
- We protect the data contained in the report against unauthorised access.
- We treat each report seriously and clarify it in accordance with established principles.
- We take remedial measures to rectify the irregularity as soon as possible.
- We inform the whistleblower of the closure of the case.
- We do not allow retaliation against whistleblowers and protect them from such actions.

WHAT WE EXPECT FROM YOU

- Identify and respond to all situations that may be unlawful and provisions of the Code of Ethics or pose a risk of such unlawfulness.
- Inform us of any irregularities you notice or suspect.
- Protect yourself and your colleagues against retaliation and report all behaviour that may constitute retaliation to the Compliance Team.
- Help us clarify irregularities when we need documents or information.



Reporting irregularities



WHAT TO REPORT

- Suspected violations of law that may concern or affect Grupa Pracuj.
- Important legal and ethical issues related to our business.
- Unlawful forms of influence and conflicts of interest.
- Situations that can be dangerous or harmful to the health of our employees and associates.
- Manifestations of discrimination or mobbing in work-related situations.
- Situations that may be considered contrary to the rules of fair competition.

Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT



Focus
on people

PROTECTION OF HUMAN RIGHTS

Human rights

– the rights and freedoms that every person is entitled to, such as:

- right to live and prohibition of torture,
- prohibition of slavery and forced labour,
- freedom and personal security,
- right to a fair trial, prohibition of punishment without legal basis, and the right to an effective remedy,
- right to respect for private and family life and the right to marry,
- freedom of thought, conscience and religion,
- freedom of expression and prohibition of discrimination,
- freedom of assembly and association.



We act with respect for human rights, fundamental freedoms and democratic principles and standards.

We make sure they are observed among employees, associates and in our value chain.

We expect suppliers of Grupa Pracuj to act in accordance with the highest standards of business ethics as well as in compliance with laws and international standards.

**Focus
on people**

PROTECTION OF HUMAN RIGHTS

OUR COMMITMENTS

- We care about the health and safety of our employees and associates.
- We are committed to maintaining equal opportunities in recruitment and employment.
- We respect the right to decent working conditions, fair wages and equal pay for work of equal value.
- We respect freedom of speech and expression.
- We recognise employees' right to association and collective bargaining.
- We respect the right to privacy by not interfering in the home or family affairs of employees and associates.
- We expect all stakeholders of Grupa Pracuj to respect human rights.

KEY INTERNATIONAL STANDARDS

- Universal Declaration of Human Rights
- Convention for the Protection of Human Rights and Fundamental Freedoms
- Conventions and recommendations of the International Labor Organization
- Charter of Fundamental Rights of the European Union
- The UN Guiding Principles on Business and Human Rights
- The International Human Rights Charter
- OECD Guidelines for Multinational Enterprises
- 10 Rules of the UN Global Compact

WHAT WE DON'T TOLERATE

- We strongly oppose child labour.
- We do not tolerate forced labour, human trafficking or any form of slavery.
- We do not accept any behaviour that violates human dignity.
- We oppose any form of discrimination.



Focus
on people

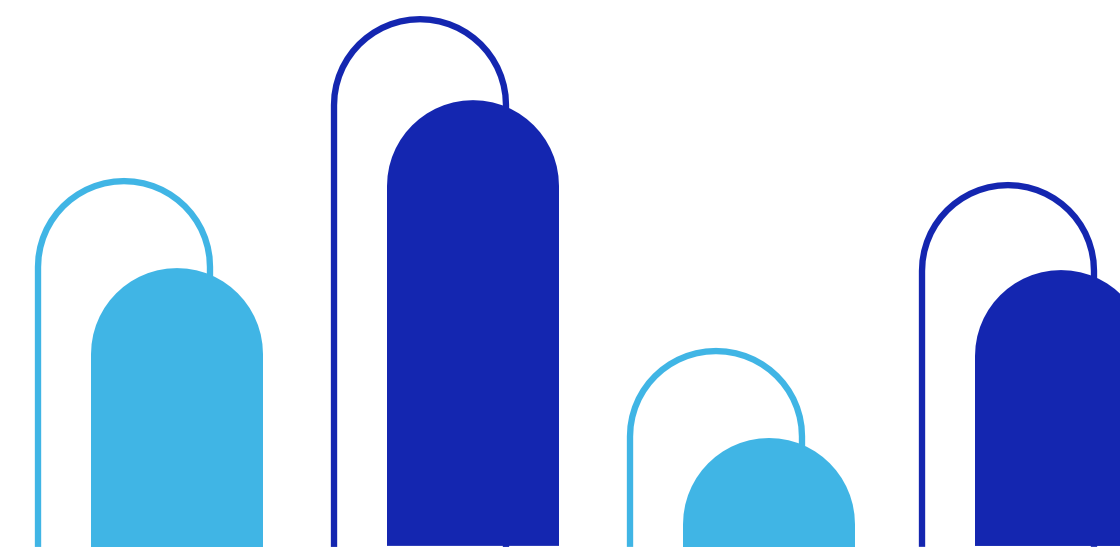
PROTECTION OF HUMAN RIGHTS

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

We have recently changed the company providing catering for events with clients. The quality of the meals initially improved considerably, but recently there have been more and more shortcomings, and the service people look tired and intimidated. When once again the job is not well done, you decide to take notice. During the conversation, an employee of the catering company apologises for the situation and asks that this information not be passed on to the owner of the company. This is because the workers are foreigners whose documents have been withheld by the employer and without them, they will not be able to find legal work after being laid off.

Immediately report such a situation to gp.zalezmi.pl. In response to your report, we will conduct an investigation and terminate cooperation with the supplier.

We will also report a suspected offence with respect to the company owner's behaviour and consider how we can help the employees. The same applies to any other signals that one of our suppliers is mistreating its employees, thereby violating provisions of the [Code of Ethics in Business Relationships](#).





Focus
on people

A SAFE AND FRIENDLY WORK ENVIRONMENT



You can find our **internal regulations related to employment** on the Intranet:

- [Work Regulations at Grupa Pracuj and eRecruitment Solutions,](#)
- [Remuneration Regulations at Grupa Pracuj and eRecruitment Solutions,](#)
- [Remote Work Regulations at Grupa Pracuj and eRecruitment Solutions.](#)

We provide services in the recruitment industry, so we have a special duty **to maintain the highest standards regarding the labour market.**

We care about the safety, well-being and dignity of our employees. We want you to enjoy your work and identify with us every day.

Focus
on people

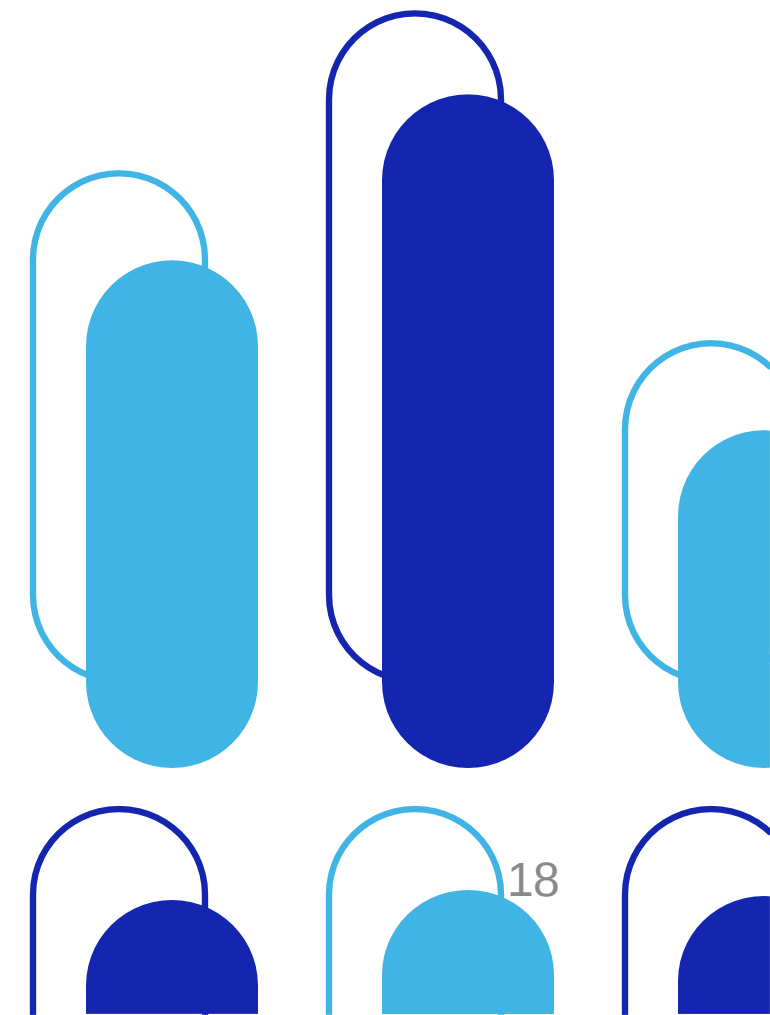
A SAFE AND FRIENDLY WORK ENVIRONMENT

OUR COMMITMENTS

- We comply with labour laws and other related regulations.
- We ensure safe and healthy working conditions.
- We provide regular occupational health and safety training for employees and prevent accidents at work.
- We periodically elect employee representatives, with whom issues concerning working conditions and organisational matters are consulted.
- We respect employees' right to rest and due holiday.
- We support work-life balance.
- We create a salary matrix based on market criteria, preceded by sound analysis.
- We provide access to private medical care and a system of attractive benefits.
- We care about the well-being of employees through well-being initiatives.

WHAT WE DON'T TOLERATE

- Failure to comply with the established work organisation, occupational health and safety or fire regulations.
- Gross or willful negligence in the performance of work duties.
- Lack of response to misconduct – both own and that of other team members.
- Behaviours that may endanger or harm the health of our employees.
- Unexcused or unconfirmed extended absences.
- Disorderly conduct, being under the influence of alcohol or intoxicants.



Focus
on people

A SAFE AND FRIENDLY WORK ENVIRONMENT

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

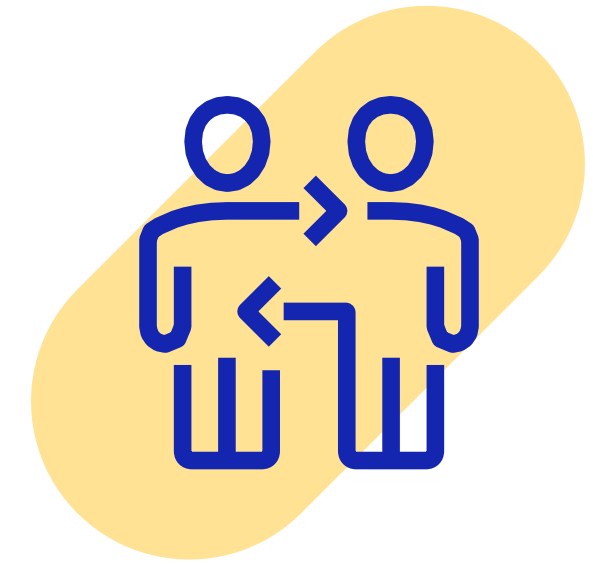
You have been invited to a regular occupational health and safety training, but due to the number of work duties, you cannot attend. You do not inform your superior about it.

Such behaviour is a violation of employee obligations under the Labour Code and exposes Grupa Pracuj to liability before the State Labour Inspection. It is your responsibility to speak with your superior, who should distribute tasks in the team in such a way as to allow you to participate in the occupational health and safety training.

Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT



Focus
on people

RESPECT FOR DIVERSITY

Mobbing – persistent and prolonged harassment or intimidation of an employee, causing the employee to have a low opinion of their professional suitability, i.e. a behaviour which:

- demeans or ridicules the employee,
- isolates or eliminates them from the team.

Discrimination – unequal treatment, such as in employment, promotion or access to training, based on some characteristic of a person (e.g. gender, age, views, etc.).

Respect for diversity is one of our core values. At Grupa Pracuj, we provide everyone with equal opportunities in access to employment, professional development or promotion opportunities. We make sure to create a friendly and engaging work environment.

We want Grupa Pracuj to be a place where everyone feels safe and comfortable. Therefore, we have adopted an [Anti-Mobbing and Anti-Discrimination Policy](#). We do not tolerate any form of mobbing or discrimination. We treat all our employees, associates and business partners fairly and transparently.

Focus
on people

RESPECT FOR DIVERSITY

OUR COMMITMENTS

- We build an atmosphere of acceptance and respect for diversity.
- We are committed to ensuring a work environment free of mobbing, harassment and discrimination.
- When selecting candidates, we are guided by their knowledge, qualifications and experience.
- We create equal opportunities for our employees in all aspects of employment.
- We promote and reward employees, taking into account their motivation and actual performance.
- We respond firmly to all identified irregularities and resolve conflict situations with respect for the position of each party.
- We support the development of women in managerial positions and undertake initiatives for the employment of women in IT.
- We promote the use of feminine forms in job titles throughout the organisation.



WHAT WE DON'T TOLERATE

- Lack of respect in relations with superiors, employees and associates.
- Behaviour that violates the dignity of our employees, associates or employees of our business partners and customers, including harassing, intimidating, excluding, disrespecting or humiliating them.
- Any form of violence, coercion or threats as a method of discipline or control.
- Harassment, including inappropriate remarks and jokes.
- Using offensive language in relationships within Grupa Pracuj, with business partners, customers and users of our products and services.
- Treating our employees and associates unfairly because of own prejudices.

Focus
on people

RESPECT FOR DIVERSITY

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

You notice that your superior has been ignoring one of your team members for some time. In meetings, he/she interrupts the person and does not allow them to finish speaking. He/she ignores the person's ideas or comments dismissively. In addition, he/she assigns the person tasks below their competencies, commenting that he/she would not be able to handle more difficult projects.

Such behaviour is unacceptable and may be indicative of mobbing. Discuss this with the HR BP overseeing your area, who will take further steps to clarify the situation.



Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT



Focus
on people

EMPLOYEE DEVELOPMENT AND OPEN COMMUNICATION

REMEMBER

- We publish news on [Worksmile](#), to which you can react and add comments.
- We post all relevant internal policies, processes and procedures on the intranet.
- We send e-mails to all employees in case of key information and potential emergencies.



At Grupa Pracuj, we create an engaging work environment, paying attention to inclusive and appreciative management, a collaborative atmosphere and providing opportunities for growth.

We focus on open, transparent and two-way communication, accessible to all employees and associates. We want you to feel confident and have access to key information, including concerning our business situation and activities.

Focus
on people

EMPLOYEE DEVELOPMENT AND OPEN COMMUNICATION

OUR COMMITMENTS

- We make sure that every employee and associate receives constructive feedback and has the opportunity to develop their competencies, skills and potential.
- We promote a single consistent standard for development conversation.
- We support reskilling within the organisation.
- We conduct position evaluation projects and develop career paths.
- We enable participation in internal and external training.
- We regularly hold communication meetings with employees and associates and answer their questions.
- We organise hackathons, competitions, webinars, training, team building events and open work groups to engage the Grupa Pracuj community.

WHAT WE DON'T TOLERATE

- Misleading with respect to opportunities for professional development or promotion.
- Ignoring constructive criticism.
- Avoid giving honest and constructive feedback.
- Disclosing private information about employees and associates without their consent or using it unethically.
- Ignoring employees' questions and concerns about their duties.





Focus
on people

EMPLOYEE DEVELOPMENT AND OPEN COMMUNICATION

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

You are involved in a large project in which one person regularly fails to meet the agreed deadlines, thus disorganising the work of other employees, and the deadline for completion of the entire project is at risk. The other team members do not want to bring up the subject with this person so as not to spoil the atmosphere, but among themselves they complain a lot about the untimeliness.

Constructive feedback is the key to orderly and respectful cooperation. Giving it does not spoil the atmosphere, and often protects the team from increasing conflict in the future. If you don't want to discuss the topic yourself, ask your superior for support. Perhaps the person concerned doesn't even realise the difficulties they are causing in project work.



Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

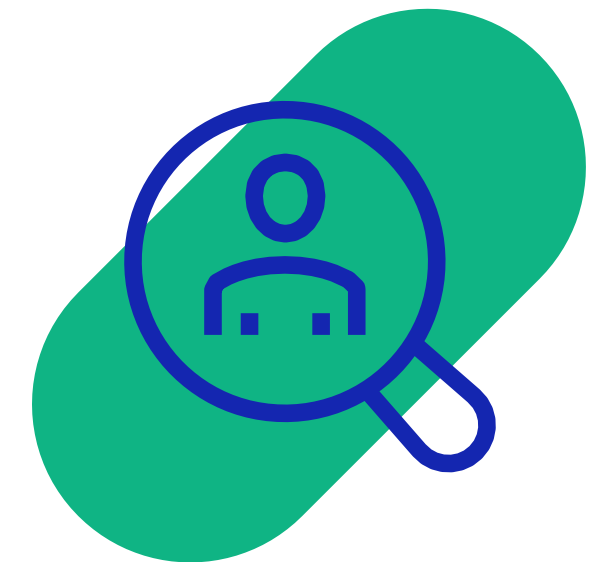
CONTACT

Relations
based on trust

FOCUS ON THE CUSTOMER

OUR MISSION

- Support organisations in employee recruitment, retention and development processes.
- Help people find the best job for them and realise their career potential.
- In doing so, use modern and most efficient technologies.



Grupa Pracuj supports organisations in employee recruitment, retention and development processes. Being a responsible and trusted partner for both sides of the market – employers and candidates – is at the heart of our business.

Integrity and business ethics are extremely important to us. In our relationship with customers, we are always guided by high standards that stem from our values and the Code of Ethics.

Relations
based on trust

**FOCUS ON
THE
CUSTOMER**

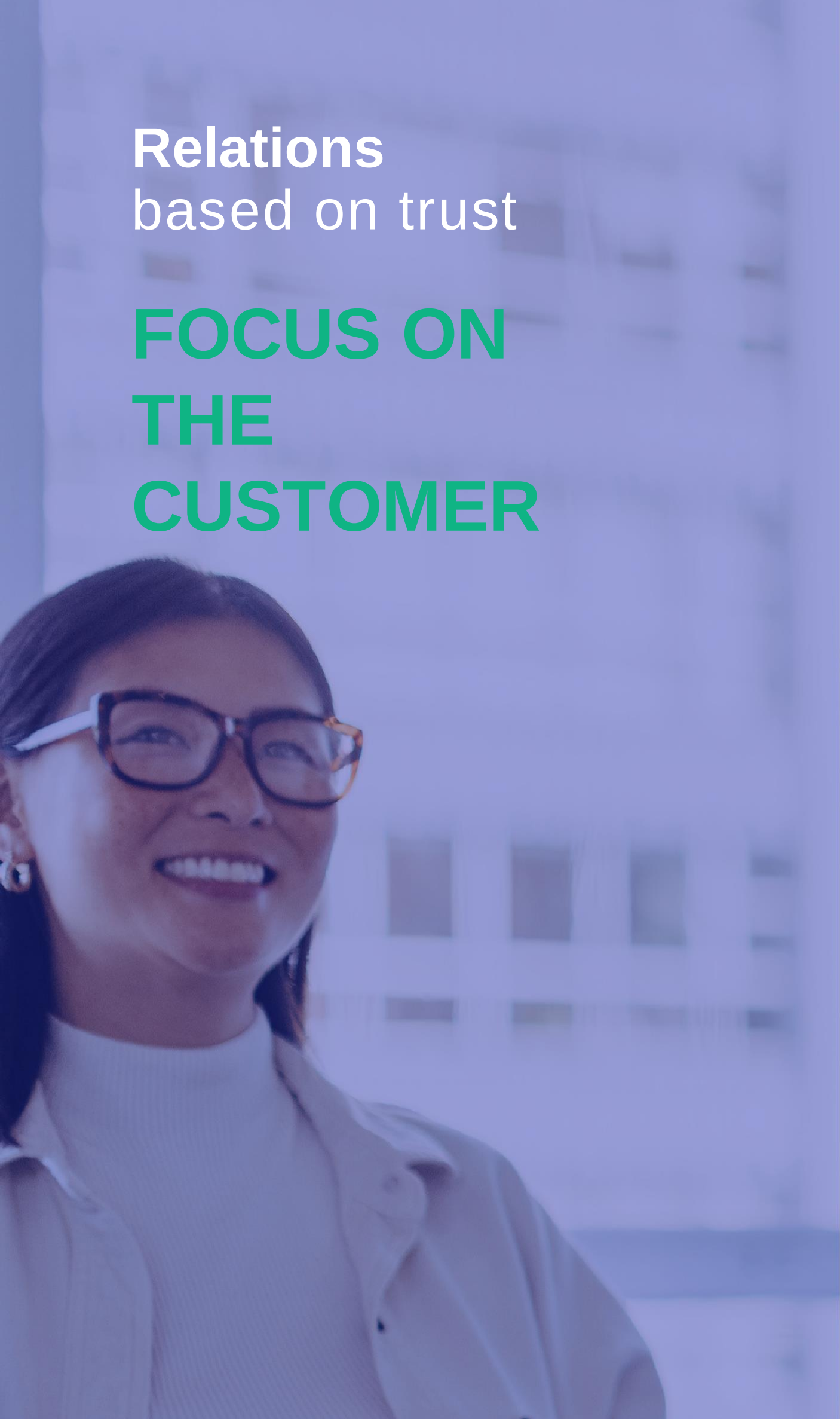
OUR COMMITMENTS

- We treat customers and business partners fairly.
- We are committed to transparency in our operations: all information provided to our customers, our advertising messages and other external communications are always clear and legal.
- We are guided by the principles of fair competition. We do not enter into agreements or conduct activities that may have the purpose or effect of disrupting competition in the market in which we operate.
- We value our customers' opinions and strive to fully understand their needs. We use the information we receive only to ensure the highest quality of services offered.
- We pay special attention to the quality of our marketing tools and activities. We strive to meet the expectations of our customers in the best possible way, and we take care of their safety and compliance with the law.
- Let's not forget our mission to help people find better jobs. After all, we have a real impact on the future of both candidates and employers.

WHAT WE DON'T TOLERATE

- Actions that may mislead our customers and their employees.
- Unclear advertising messages that are designed to manipulate audiences.
- Disregarding the opinions and needs of our customers.
- Presenting competitors in an unfair or untruthful manner.
- Making promises to customers that we are unable to fulfill.





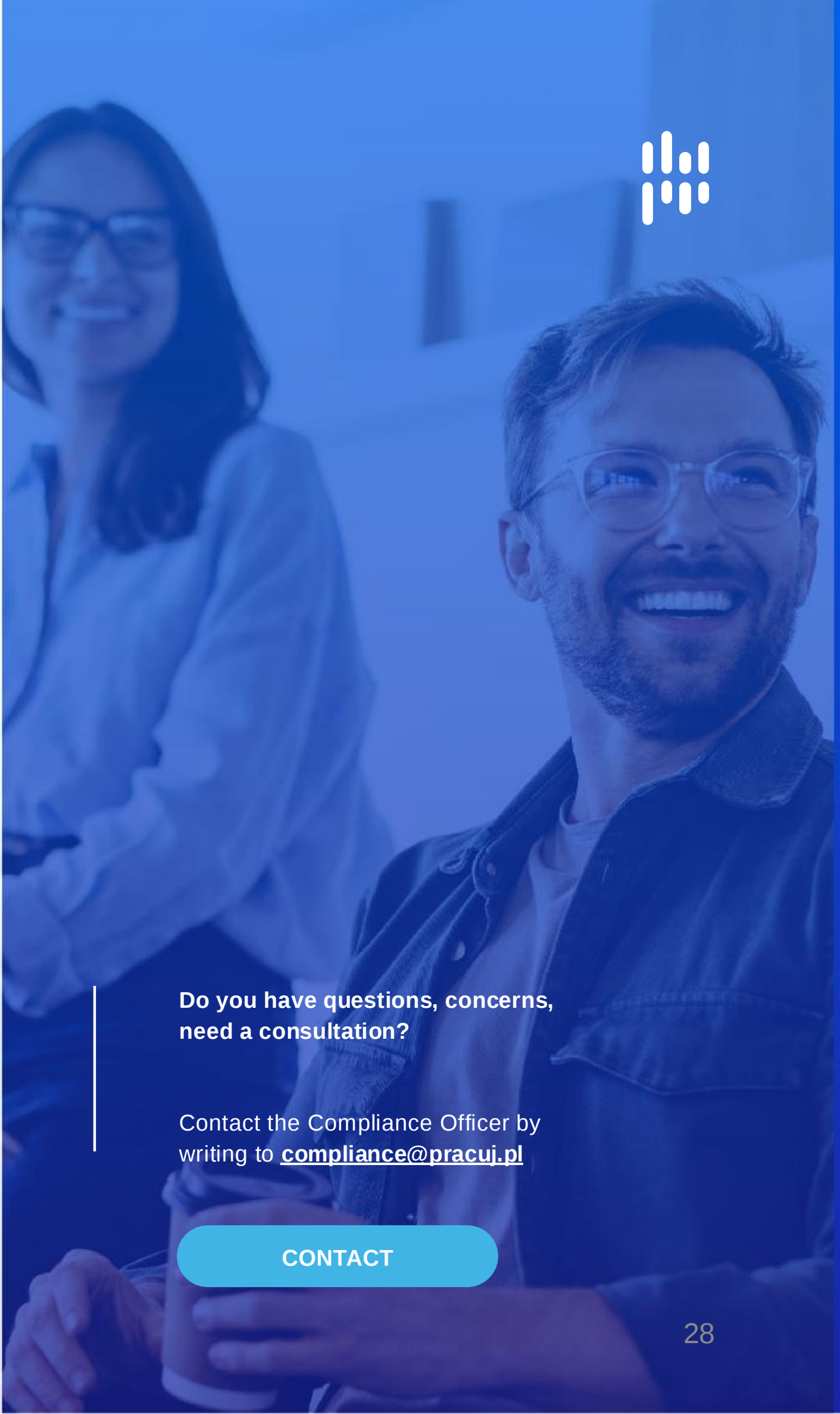
Relations
based on trust

FOCUS ON THE CUSTOMER

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

A customer is thinking about buying an ATS system and is considering our offer and that of our competitors. During the meeting, you convince the customer that our system is a better choice because the competition is having financial problems and is laying off people responsible for the customer care area. In the near future, it will have a problem with maintaining continuity of services and the lower price is due to the need to raise funds as soon as possible to settle current obligations.

Such behaviour is not only unprofessional but may also constitute an act of unfair competition. The conversation with the customer should be based only on the advantages of our own system, and preferably without bringing up the topic of competition at all.



Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT

Relations
based on trust

VALUE CHAIN SECURITY

VALUE CHAIN

– the sequence of activities and relationships undertaken by a company to develop, produce, sell and deliver a service, and then provide after-sales services. As part of the value chain, we can benefit from the support of external suppliers.



We believe that responsible and transparent business operations, based on respect for the law, accountability and clear communication, is key to sustainable development.

Based on our values and principles, we have developed the [Code of Ethics in Business Relationships](#) as the minimum standard we expect from our suppliers.

Relations
based on trust

VALUE CHAIN SECURITY

OUR COMMITMENTS

- We require all suppliers to comply with the law and the [Code of Ethics in Business Relationships](#) adopted at Grupa Pracuj.
- We operate transparently and do not impede other players' access to the market.
- We do not favour anyone. We are open to working with anyone who provides products or services that meet our requirements and needs.
- Before starting cooperation, we verify the supplier to minimise the risk of working with an unreliable partner.
- We do not work with suppliers who may have been involved in any corrupt activities or other material violations of the law. Suppliers are required to inform us of any corruption risks and other irregularities that may affect our cooperation.

WHAT WE EXPECT FROM YOU

- When choosing a supplier, be guided by established criteria such as price, quality, customer reviews, reliability, timeliness.
- Keep only the interests of Grupa Pracuj in mind when considering a supplier.
- Follow the rules set forth by the Procurement Team in the Procurement Guide.
- Ensure transparent cooperation with suppliers.
- Inform us of any off-duty contacts with the supplier that may affect future cooperation.



Relations
based on trust

VALUE CHAIN SECURITY

Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT

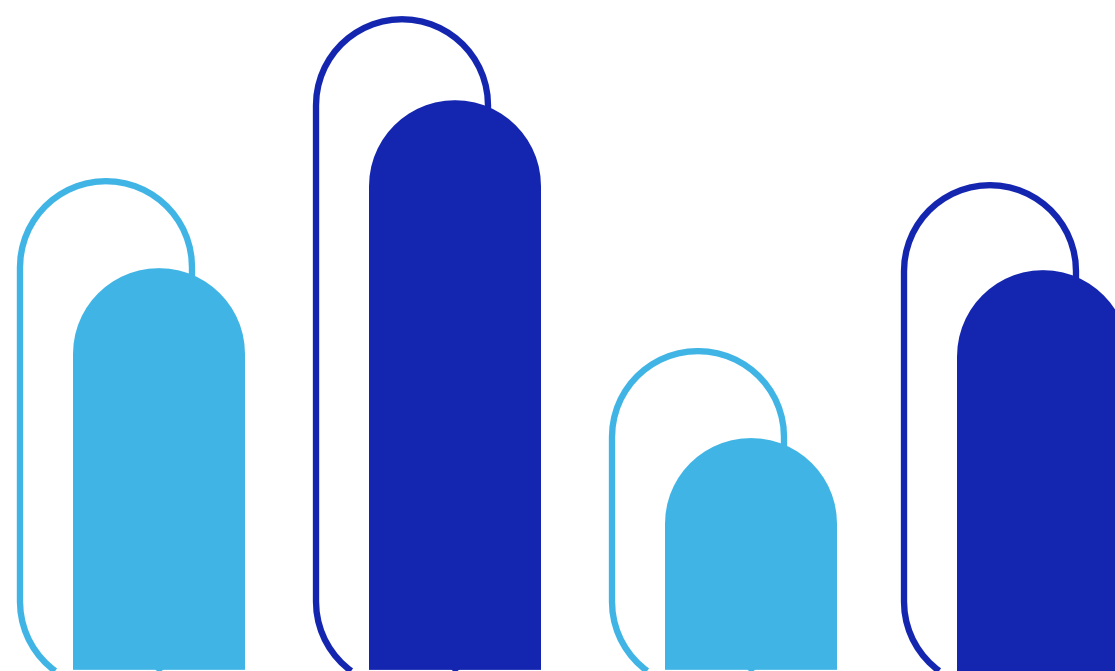
WHAT WE DON'T TOLERATE

- Establishing cooperation with suppliers without verifying them in accordance with Grupa Pracuj policies.
- Accepting inappropriate benefits from a supplier, both before and during cooperation.
- Undertaking cooperation with individuals with whom you have a personal relationship or whose connections (e.g. political or family) may damage the credibility of Grupa Pracuj.

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

You intend to start cooperation with a supplier who will provide marketing services for Grupa Pracuj. You know that such services are provided by one of your relatives, who could offer a big discount compared to the competition.

The selection of a supplier should always be transparent, based on objective criteria, and strive for the highest quality of the service provided. Report your situation to compliance@pracuj.pl and we will analyse whether there is a conflict of interest that could cause reputational and financial damage to Grupa Pracuj. Among other things, we will verify whether procurement procedures have been followed in the situation described and how the contract is planned to be implemented. In addition, due to personal connections, you should not participate in the supplier selection process, in accounting for the supplier's performance, or in the approval of acceptance reports.



Relations
based on trust

INTEGRITY IN BUSINESS

Corruption – giving, accepting, promising or demanding benefits (e.g. money, expensive gifts, promotion) in exchange for:

- abuse of authority,
- failure to comply with duties,
- other unlawful use of one's position.

Conflict of interest – a situation where personal interests or connections (e.g. family) can affect the objectivity of decisions.



At Grupa Pracuj, we have introduced an absolute ban on activities that can be considered corruption. We follow the adopted [Anti-Corruption Code](#) and [Gift Policy](#).

In all relationships, we are guided by transparency and integrity. Our communication is clear and gives no room for ambiguity. We avoid situations that may lead to conflicts of interest.

Relations
based on trust

INTEGRITY IN BUSINESS

OUR COMMITMENTS

- We comply with all anti-corruption laws.
- We do not offer or accept benefits or approve any activities or forms of influence that could be considered corruption.
- We respect the rules of other entities – we do not send gifts or invite people to certain types of meetings if such practices are not accepted by them.
- We resolve conflicts of interest in accordance with the [Anti-Corruption Code](#).

WHAT WE EXPECT FROM YOU

- Do not accept or offer gifts or personal benefits that may influence decisions or obligate reciprocity.
- Exceptions include small occasional gifts and invitations (e.g. holiday gifts, invitations to cultural or industry events, marketing gadgets).
- Consult other types of benefits, as well as any concerns, with the Compliance Team.
- If someone tries to influence your business decisions by offering something informally, firmly refuse and report any such situation to the Compliance Team.
- Report possible conflicts of interest to the Compliance Team.



Relations
based on trust

INTEGRITY IN BUSINESS

Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT

WHAT WE DON'T TOLERATE

- Using one's position for personal or financial gains.
- Accepting personal benefits in exchange for contracts with suppliers.
- Presenting gifts and invitations to persons holding public offices.
- Presenting and accepting gifts during key business negotiations.
- Giving and accepting: money, vouchers, personal (personalised) gifts, exclusive and luxury products or invitations, electronic equipment.

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

A client's representative working at the municipal office has informed you that the office will soon announce a tender for the purchase of recruitment ads.

He/she has suggested that Grupa Pracuj could submit a high bid with prices that are very attractive to us, and he/she would make sure it was selected. He/she has mentioned that he/she ran a consulting firm and could support Grupa Pracuj in providing training to the HR industry. We can determine the details of cooperation after the tender is decided.

Such a proposal is corrupt in nature, and accepting it exposes you to criminal liability and Grupa Pracuj to massive reputational damage and loss of trust from public sector clients. Not only can you not accept it, but by your behaviour and attitude you should strongly protest against even indirect suggestions by the client's representative that he or she may unlawfully influence the outcome of the tender process. Report the situation immediately to compliance@pracuj.pl, and we will decide on the next steps. Among the things to be determined are the need to report a suspected offence and decide whether to participate in the tender process.



Acting
responsibly

TAKING CARE OF THE COMPANY'S GOOD AND PROTECTING SECRETS

Company secret – information that has economic value and has not been made public, and Grupa Pracuj has taken measures to keep it confidential. This includes, for example, specialised know-how, sales data, strategic plans, source code.

Confidential information – precise, undisclosed information concerning Grupa Pracuj or its shares that, if made public, could have a significant impact on the share price.



We protect our corporate secrets and confidential information by applying detailed security guidelines adopted at Grupa Pracuj. We are equally committed to keeping the secrets of our customers and partners.

Our reputation and credibility are extremely important to us. Therefore, in all circumstances, including off-duty, have the good name of Grupa Pracuj in mind.

Acting
responsibly

TAKING CARE OF THE COMPANY'S GOOD AND PROTECTING SECRETS



OUR COMMITMENTS

- We adhere to the principles of confidentiality and prohibition of dissemination of secrets of both Grupa Pracuj and our business partners.
- We ensure that confidential information and other data are properly secured and inaccessible to unauthorised persons.
- We make sure that our communication is uniform and consistent, placing great importance on ensuring that it complies with our principles and values as described in the Code of Ethics.

WHAT WE EXPECT FROM YOU

- Protect company secrets, according to the rules established for your area, which you can find here. Use them only for their intended purpose.
- Comply with the confidentiality obligations described in your contract with Grupa Pracuj and consistent with your position and/or responsibilities/activities.
- Avoid situations that can negatively affect our business and reputation.
- If you are going to speak publicly on behalf of Grupa Pracuj, consult first with those responsible for the communication and marketing area.
- Identify confidential information and protect it in accordance with the Regulations for Circulation and Protection of Access to Confidential Information.

Acting
responsibly

TAKING CARE OF THE COMPANY'S GOOD AND PROTECTING SECRETS

Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT



WHAT WE DON'T TOLERATE

- Sharing confidential information with unauthorised persons.
- Using information obtained at work for private gains, e.g. trading on the stock market.
- Damaging our reputation, such as on social networks.
- Presenting your private position as the company's position.

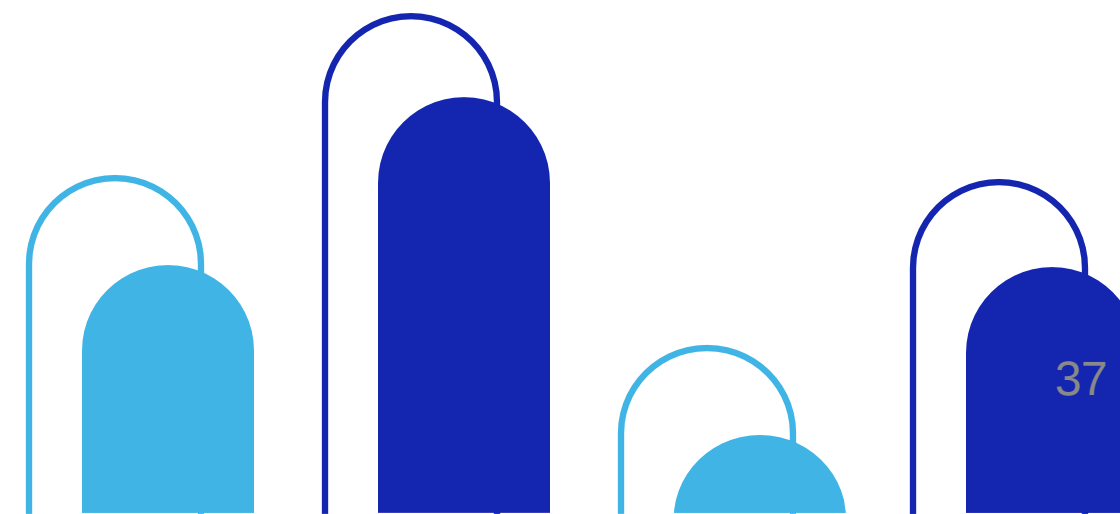
WHAT THIS MIGHT LOOK LIKE IN PRACTICE

You work in sales and have received a very attractive offer to move to a competitor. The condition is to hand over a list of your customers containing sales data

and contacts to the people responsible for buying ads. You are in ongoing contact with your customers and assume that they would not mind if this data was transferred.

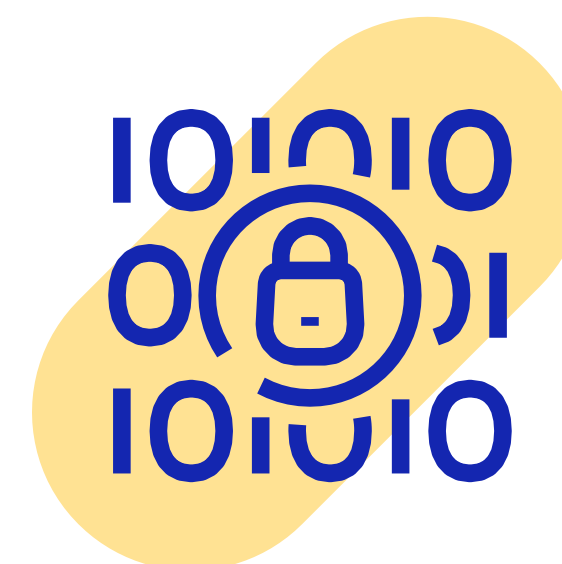
However, such action is a violation of basic employee duties and constitutes an act of unfair competition. This is subject not only to disciplinary and organisational consequences, but even criminal ones. The details of business cooperation with clients is a company secret of Grupa Pracuj and your potential employer exposes themselves and you to liability by making such a proposal.

If you ever become aware of attempts to copy data for private purposes, report them as soon as possible to incidents@pracuj.pl.



Acting
responsibly

INFORMATION SECURITY



Information security is a priority for us – in terms of our own know-how, but, above all, in terms of security of the data entrusted to us by our customers.

Comply with the information security standards adopted at Grupa Pracuj. Ensure protection of all information and equipment entrusted to you, in accordance with the [Information Security Policy](#).

Acting
responsibly

INFORMATION SECURITY

OUR COMMITMENTS

- We use security measures in accordance with the highest security standards.
- We carefully verify IT solution providers in terms of meeting our standards.
- We make sure that information is secured and inaccessible to unauthorised persons.
- We seek to raise the awareness of employees and associates by training them in security rules.

WHAT WE EXPECT FROM YOU

- DO NOT share your company equipment with third parties, even family; protect the equipment from damage and theft.
- Use secure passwords and do not share them with anyone; if a password has been compromised, change it immediately, and use MFA (Multifactor Authentication) whenever technically possible.
- In public places, pay attention to what you say and what can be seen on your devices.
- Use only authorised systems and tools at work, install only software from the company's portal, otherwise contact the Security Department for verification.
- Remember to keep the software on your company equipment up to date.
- Pay attention to the e-mails you receive. Don't click on links or open attachments you're not sure about – report any suspicious e-mails using the Phish Alert button.
- When working remotely, take care to properly secure your home WiFi network (at least WPA2 standard, change the default administrator password); when working from a hotel or restaurant, use the Internet shared from your phone (HotSpot), do not connect to unknown, external WiFi networks.
- Do not plug flash drives and other devices of unknown origin into your computer, including those that are advertising materials, found “on the street” or borrowed.
- Report any incidents to incidents@pracuj.pl.



Acting
responsibly

INFORMATION SECURITY

Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT



WHAT WE DON'T TOLERATE

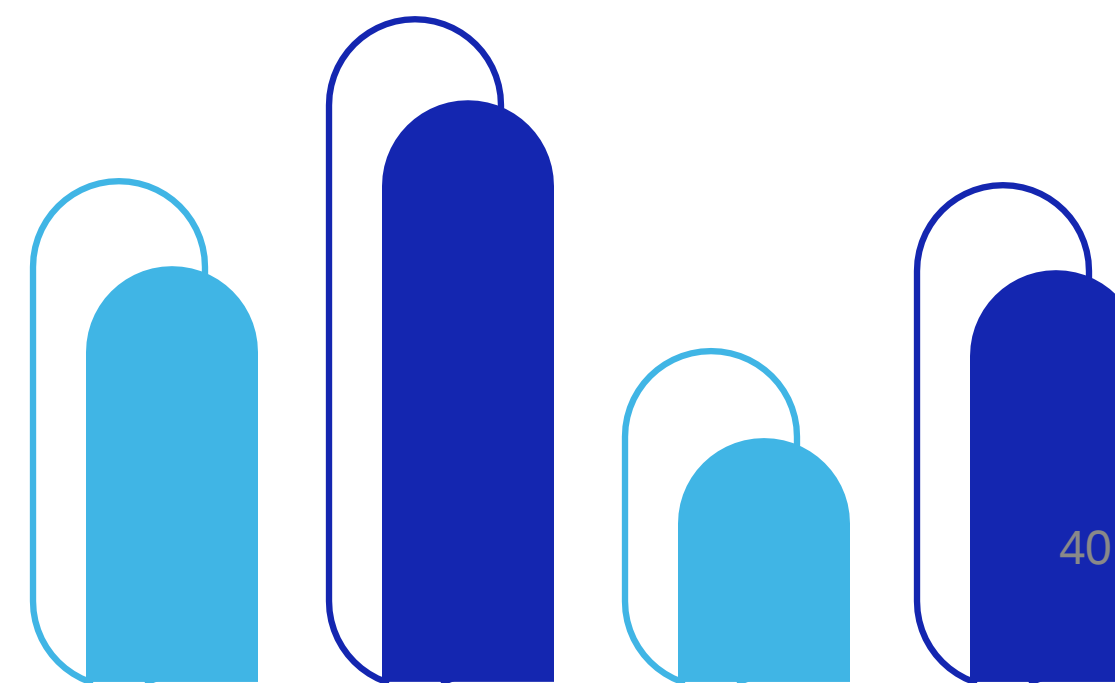
- Sharing information with unauthorised persons.
- Unfamiliarity with or failure to comply with the information security rules adopted at Grupa Pracuj.
- Intentionally accessing information and data that you are not entitled to have.
- Using data in an unauthorised or random manner.

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

You have received an e-mail from a sender you know containing a link that redirects you to an invoice for services rendered that you are currently waiting for.

A coincidence, a real recipient – all this lulled into a false sense of security and, unfortunately, in the heat of the moment, you did not look carefully at where the link leads to and clicked on it and provided your login and password. It turned out to be a fake site.

Change your password right away and report such a situation as soon as possible using the Phish Alert button in your e-mail by sending a message to incidents@pracuj.pl, or simply call the person in the Security Department. **What is so dangerous? Clicking and providing all the data that allows a criminal to access our internal network and all our resources.**



Acting
responsibly

PERSONAL DATA PROTECTION

Personal data – any information relating to an identified or identifiable natural person, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.



We protect the privacy and personal information of our customers, employees, associates and business partners. We have appointed a Data Protection Officer to ensure that all our operations are compliant with the GDPR in accordance with the adopted [Personal Data Protection Policy](#).

You have a duty to protect the data we entrust to you and properly document compliance with the requirements placed on you in this area.

Acting
responsibly

PERSONAL DATA PROTECTION



OUR COMMITMENTS

- We perform all controller and processor duties indicated in the GDPR.
- We make sure that our processing complies with provisions of the GDPR.
- We enable data subjects to exercise their rights.
- We conduct a risk analysis and implement appropriate security measures to ensure the confidentiality, integrity and availability of data.
- We verify the entities to which we want to entrust personal data and ensure the security of this data by entering into appropriate agreements.
- We provide employees and associates with data protection knowledge through regular training.

WHAT WE EXPECT FROM YOU

- Comply with regulations and perform all obligations under the GDPR.
- Carry out the duties described in the [Personal Data Protection Policy](#) and other data protection documents adopted at Grupa Pracuj.
- Report all data protection violations to us at incidents@pracuj.pl.
- When you process personal data, always use appropriate security measures.
- Never share customer or supplier data with unauthorised parties.
- If you have concerns about data processing, contact the Data Protection Officer at iod@pracuj.pl.

Acting
responsibly

PERSONAL DATA PROTECTION

Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT



WHAT WE DON'T TOLERATE

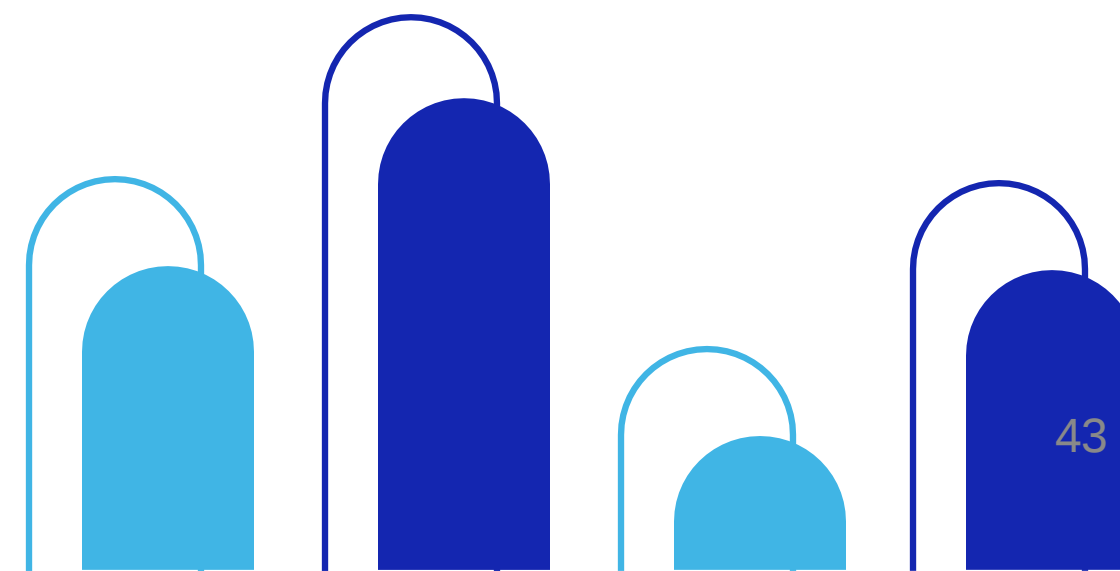
- Using for your own purposes personal data to which you have access in connection with the performance of your duties.
- Failure to inform us of data protection violations.
- Ignoring the principles of personal data protection.

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

At one of the conferences, you meet a representative from a company that specialises in providing quality leads for HR entities. After purchasing a subscription, you will get access to a system containing data of potential customers along with an indication of their sales potential and a proposed strategy

for acquiring a customer from a competitor. You decide to buy access for your team to help them reach their target this quarter.

Any new system should be reviewed by the Legal Department, Data Protection Team and Security Department before purchase. The first step of such verification is to determine from what source the data is obtained for the system. **We do not use personal data of unknown origin that was collected in violation of the GDPR.** The purchase of such a system is therefore likely to be unlawful, and its use exposes Grupa Pracuj to financial penalties and reputational damage.





Acting
responsibly

SUSTAINABLE DEVELOPMENT

Sustainable development – it is development by which the needs of the present generation can be met without limiting the opportunities of future generations. This means conducting business with respect for human rights and the environment, among other things.



We are aware of our responsibility for the economic, social and environmental impact of our activities. Therefore, we conduct our business with respect for the environment and the interests of local communities, trying to minimise the negative effects of our activities. We encourage everyone to support these efforts, as the daily habits of employees and associates as well as their environmental awareness can make a significant contribution to protecting the planet.

In our operations, we also take into account the opinions of our stakeholders including, among others, our business partners, customers and users.

Acting
responsibly

SUSTAINABLE DEVELOPMENT

OUR COMMITMENTS



- We care for the welfare of people, the environment and the transparency of our operations.
- We respect and comply with the law.
- When making business decisions, we consider their long-term impact on the environment, employees, associates, business partners, customers and users.
- We monitor and analyse sustainability risks in Grupa Pracuj's business operations.
- We focus on economical handling of natural resources, continuous reduction of environmental impact and compliance with all related regulations.
- We shape environmental awareness in the organisation and in the HR market.
- We strive to reduce greenhouse gas emissions through efficient energy management.
- We support the local community by engaging the funds of Grupa Pracuj and the time of our employees in a program to support public benefit organisations.

WHAT WE EXPECT FROM YOU

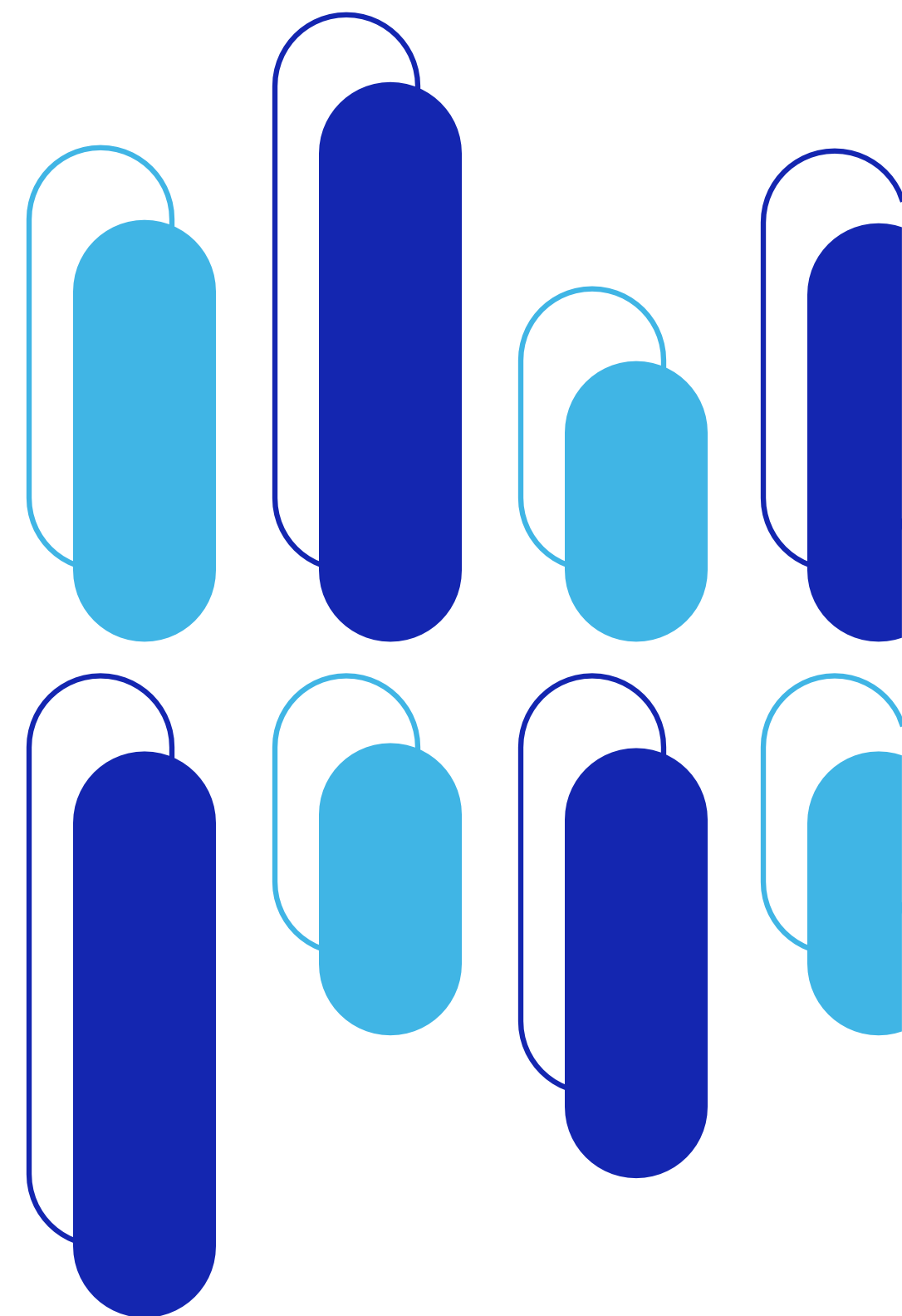
- Be aware of your environmental responsibility and promote the right attitudes.
- Segregate waste according to the rules and try to avoid disposable packaging and plastic.
- Use less paper – print only the documents you need.
- Save water and prevent heat loss during the heating season.
- If you can, choose to travel by bicycle or public transport.
- Turn off lights when you leave rooms and appliances you are not using.
- Always put devices into sleep mode when you walk away from them – not only for the sake of the environment, but also for data protection and the security of confidential information.

Acting
responsibly

SUSTAINABLE DEVELOPMENT

WHAT THIS MIGHT LOOK LIKE IN PRACTICE

Everyday habits make a difference – such as segregating waste or turning off lights and appliances when you leave the office after work. Also, do not print documents that you can read on the screen or transmit electronically. Each of us is responsible for our actions and contributes to the sustainable development of Grupa Pracuj.





Do you have questions, concerns,
need a consultation?

Contact the Compliance Officer by
writing to compliance@pracuj.pl

CONTACT